

## **DRAFT**

### **IBIA Privacy Best Practice Recommendations for Commercial Biometric Use**

#### **Additional Comments and Clarifications for Discussion at NTIA Meeting on July 24, 2014**

At the NTIA Privacy Multistakeholder Meeting on Facial Recognition Technology held on June 24, IBIA presented a discussion paper describing its Privacy Best Practice Recommendations. There were comments and questions raised regarding IBIA's views on anonymity. We welcome these comments and wish to provide the following additional points of clarification in response:

- 1) Privacy and anonymity are not the same.
- 2) Privacy is the legal principle by which our society addresses and reconciles competing values between freedom and the need for social cohesion and responsibility for America's success.
- 3) Opting out of anonymity does not constitute a loss of any right to privacy.
- 4) Our right to privacy is enshrined in our legal system through legislation and case law.
- 5) The declared purpose of these NTIA meetings is to discuss consumer privacy and facial recognition without any reference to consumer anonymity.
- 6) Therefore, the focus of the NTIA discussions should be consistent with the NTIA mission and within the framework of privacy principles and established law.
- 7) The draft Best Practice Recommendations provided by IBIA are consistent with this stated NTIA purpose and are focused on the principles of privacy.

Since the expansion of this discussion to anonymity is inconsistent with the NTIA's objectives and authority, the IBIA will focus exclusively on the core issue of privacy and will update its Best Practice Recommendations as appropriate.